

**REMARKS**

By this amendment, claim 16 has been amended to correct a typographical error submitted in an amendment filed on March 20, 2002. Applicants submit that this amendment is not in response to an objection or rejection of the claim by the Examiner.

In response to the Office Action dated June 4, 2002, Applicants request reconsideration of the Examiner's rejection for the following reasons.

In the Office Action, the Examiner rejected claims 1-18 under 35 U.S.C. § 102(b) as anticipated by *Heung*, U.S. Patent No. 5,287,009.

"Anticipation under 35 U.S.C. § 102 requires disclosure in a single piece of prior art each and every limitation in the claimed invention." *Apple Computer, Inc. v. Articulate Sys., Inc.*, 234 F.3d 14, 20 (Fed. Cir. 2000). "An anticipating reference must describe the claimed invention with sufficient clarity and detail to establish that the subject matter existed and that its existence was recognized by persons of ordinary skill in the field of the invention." *ATD Corp. v. Lydall, Inc.* 159 F.3d 534 (Fed. Cir. 1998).

Independent claim 1 recites a method of replacing a fan module, comprising, among other things, controlling a fan drive voltage not to be supplied to a fan module to be replaced when the replacement is instructed.

In contrast, *Heung* teaches an electronic circuit module fan assembly 10 having a circuit module housing 12, a number of circuit modules 14, and a fan module 16 (see Figs. 1 and 2). *Heung* further discloses a capability of interchanging the circuit modules and fan modules (see col. 3, ll. 33-34). *Heung*, however, fails to disclose at least controlling a fan drive voltage as recited in claim 1. Instead, *Heung* teaches placement of a replaceable fan module near the circuit modules to realize a reduction in power consumption. Thus, *Heung* fails to disclose controlling the fan driving voltage not to be

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supplied to the fan module to be replaced, as required by claim 1. For at least this reason, *Heung* fails to teach every element of claim 1, and thus, does not anticipate this claim. Applicants submit that the Examiner's rejection of claim 1 under 35 U.S.C. § 102 is improper and should be withdrawn.

Independent claim 6 recites an electronic apparatus, comprising, among other things, means for controlling a fan drive voltage not to be supplied to a fan module to be replaced when a replacement is instructed. The Examiner alleges that *Heung* teaches this claim element. To the contrary, however, *Hueng* teaches placement of a replaceable fan module near the circuit modules to realize a reduction in power consumption. Thus, *Heung* fails to disclose controlling the fan driving voltage not to be supplied to the fan module to be replaced, as required by claim 6. Because *Heung* fails to teach, "means for controlling the fan drive voltage" as recited in claim 6, Applicants submit that the Examiner's rejection of claim 6 under 35 U.S.C. § 102 is improper and should be withdrawn.

Independent claim 16 recites an electronic apparatus capable of replacing a fan module during operation comprising, among other things, a relay cable coupled to a fan module for transmitting a fan drive voltage and capable of being disconnected/connected from/to a fan module, and means for controlling a fan drive voltage not to be supplied via the relay cable to a fan module to be replaced when the replacement is instructed.

In contrast, *Heung* teaches a fan module 16 having a fan unit 30 mounted to a fan module baseboard 28 by fan bolts 40. *Heung* further teaches that the fan module 16 receives electrical power via fan power wires 32. Applicants submit that these fan

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power wires do not anticipate the claimed relay cable as recited in claim 16. In particular, fan power wires 32 merely supply power to fan unit 30, as shown in Fig. 2. In contrast, as explained in Applicants' specification at, for example, page 9, lines 13 et seq., fan voltage control section 214 is connected to relay units 221 by relay cables 25 to control operation, including supplying DC power, to the fan units F1 to F4.

Thus, *Heung* fails to teach at least a relay cable coupled to a fan module as recited in the claim. Moreover, as discussed above with respect to claims 1 and 6, *Heung* fails to teach means for controlling a fan drive voltage as recited in the claim.

Because *Heung* fails to teach at least a relay cable or means for controlling a fan drive voltage as recited in claim 16, it follows that *Heung* is further not capable of teaching replacing a fan module during operation as recited in the claim. In contrast, *Heung* is directed to a system for keeping a circuit module cool and providing ease of maintenance in replacement of the circuit modules (col. 5, ll. 45-56; col. 6, ll. 7-14). Thus, *Heung* fails to teach every element recited in claim 16. As a result, Applicants submit that the Examiner's rejection of claim 16 under 35 U.S.C. § 102 is improper and should be withdrawn.

Because claims 2-5, 7-15, 17, and 18 depend either directly or indirectly from one if independent claims 1, 6, and 16, Applicants submit that they are allowable for at least the same reasons given above based on this dependency.

In view of the foregoing amendments and remarks, Applicants respectfully request the reconsideration and reexamination of this application and the timely allowance of the pending claims.

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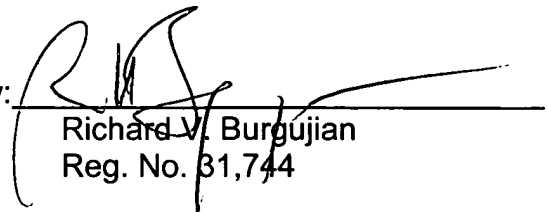
Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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Dated: September 4, 2002

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Application Number: 09/812,786  
Filing Date: March 15, 2001  
Attorney Docket Number: 4329.2538-00

## APPENDIX TO AMENDMENT OF SEPTEMBER 4, 2002

### Version with Markings to Show Changes Made

#### Amendments to the Claims

16. (Twice Amended) An electronic apparatus capable of replacing a fan module during operation, comprising:

a relay cable coupled to a fan module for transmitting a fan drive voltage and capable of being disconnected/connected from/to a fan module;

means for instructing a replacement of a fan module; and

means for controlling a fan drive voltage not to be supplied via the relay [capable] cable to a fan module to be replaced when the replacement is instructed.

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